

SEALED

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Criminal No.: 19 Cr 10302
)
 v.) Violations:
)
(1) JULIO PUELLO SOSTRE,) Count One: Conspiracy to Distribute
 Defendant) 28 grams or More of Cocaine Base
) (21 U.S.C. § 846)
)
) Count Two:
) Distribution of Cocaine Base
) (21 U.S.C. § 841(a)(1))
)
) Count Three:
) Distribution of Cocaine Base
) (21 U.S.C. § 841(a)(1))
)
) Forfeiture Allegation
) (21 U.S.C. § 853)
)

INDICTMENT

COUNT ONE

Conspiracy to Distribute 28 grams or More of Cocaine Base
(21 U.S.C. § 846)

The Grand Jury charges:

From a time unknown, but from no later than on or about July 13, 2017, and continuing through on or about August 30, 2017, at Lawrence, in the District of Massachusetts, and elsewhere, the defendant,

(1) JULIO PUELLO SOSTRE,

conspired with persons known and unknown to the Grand Jury, to knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1).

It is further alleged that the offense charged in Count One involved 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance. Accordingly, 21 U.S.C. § 841(b)(1)(B)(iii) is applicable to this Count.

It is further alleged that, with respect to Count One, 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, was reasonably foreseeable by, and is attributable to, (1) JULIO PUELLO SOSTRE. Accordingly, 21 U.S.C. § 841(b)(1)(B)(iii) is applicable to defendant (1) JULIO PUELLO SOSTRE,

All in violation of Title 21, United States Code, Section 846.

COUNT TWO
Distribution of Cocaine Base
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about July 13, 2017, at Lawrence, in the District of Massachusetts, the defendant,

(1) JULIO PUELLO SOSTRE,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THREE
Distribution of Cocaine Base
(21 U.S.C. § 841(a)(1))

The Grand Jury further charges:

On or about August 22, 2017, at Lawrence, in the District of Massachusetts, the defendant,

(1) JULIO PUELLO SOSTRE,

did knowingly and intentionally distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

FORFEITURE ALLEGATION
(Title 21, United States Code, Section 853)

The Grand Jury further finds:

1. Upon conviction of the offenses in violation of Title 21, United States Code, Sections 846 and 841(a)(1), as set forth in Counts One through Three of this Indictment, the defendant,

(1) JULIO PUELLO SOSTRE,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of such offenses; and any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. The property to be forfeited includes, but it is not limited to, the following:

a) a sum of money equal to the total amount of proceeds traceable to the offenses alleged in Count One through Three of this Indictment, which may be entered in the form of a forfeiture money judgment.

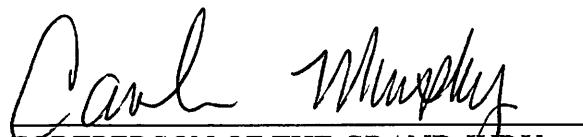
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant –

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty;

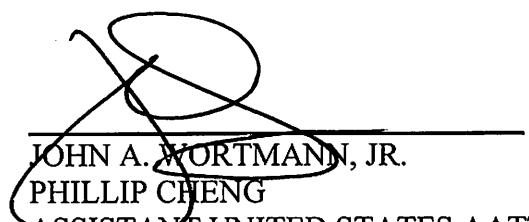
it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL



FOREPERSON OF THE GRAND JURY


JOHN A. WORTMANN, JR.
PHILLIP CHENG
ASSISTANT UNITED STATES ATTORNEYS
DISTRICT OF MASSACHUSETTS

August 21 2019

Returned into the District Court by the Grand Jurors and filed.



8.21.2019 @ 12:27pm